

NICHOLS KASTER & ANDERSON, PLLP  
Donald H. Nichols, MN State Bar No. 78918  
nichols@nka.com  
(Admitted *pro hac vice*)  
Paul J. Lukas, MN State Bar No. 22084X  
lukas@nka.com  
(Admitted *pro hac vice*)  
4600 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
Telephone: (612) 256-3200  
Facsimile: (612) 215-6870

NICHOLS KASTER & ANDERSON, LLP  
Bryan Schwartz, State Bar No. 209903  
schwartz@nka.com  
Matthew C. Helland, State Bar No.250451  
helland@nka.com  
One Embarcadero Center  
Suite 720  
San Francisco, CA 94111  
Telephone: (415) 277-7236  
Facsimile: (415) 277-7238

Attorneys for Individual and Representative Plaintiffs

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Philip Wong and Frederic Chaussy,  
individually, on behalf of all others  
similarly situated, and on behalf of the  
general public,

Plaintiffs,

vs.

HSBC Mortgage Corporation (USA);  
HSBC Bank USA, N.A.; HSBC  
Holdings, Inc.; and DOES 1 through 50,  
inclusive,

Defendants.

**Case File No. 07-cv-2446 MMC**

**NOTICE OF CONSENT FILING**

1 PLEASE TAKE NOTICE, that pursuant to 29 U.S.C. § 216, Plaintiffs hereby file the  
2 attached Consent Form(s) for the following person(s):

3  
4 Yep, Raymond

5  
6 Dated: April 29, 2008

s/Bryan J. Schwartz

---

7 **NICHOLS KASTER & ANDERSON, LLP**

8 Bryan Schwartz, State Bar No. 209903  
9 Matthew Helland, State Bar No. 250451  
10 One Embarcadero Center  
11 Suite 720  
San Francisco, CA 94111  
Telephone: (415) 277-7236  
Facsimile: (415) 277-7238

12 **NICHOLS KASTER & ANDERSON, PLLP**

13 Donald H. Nichols, MN Bar No. 78918  
14 (Admitted *pro hac vice*)  
Paul J. Lukas, MN Bar No. 22084X  
15 (Admitted *pro hac vice*)  
4600 IDS Center, 80 South 8<sup>th</sup> Street  
16 Minneapolis, MN 55402  
Telephone (612) 256-3200

17  
18 ATTORNEYS FOR PLAINTIFFS AND THE  
19 PUTATIVE CLASS  
20  
21  
22  
23  
24  
25  
26  
27  
28

# **CONSENT FORM AND DECLARATION**

I hereby consent to join the lawsuit against HSBC Bank USA, NA, and its joint employers, parents and/or subsidiaries ("HSBC"), as a Plaintiff to assert claims against it for violations of the wage and hour laws of the United States and/or the state(s) where I worked for HSBC. During the past four years, there were occasions when I worked over 8 hours a day and 40 hours per week for HSBC and did not receive overtime compensation, and/or occasions when I was not authorized and permitted and/or provided a meal and/or rest period required under California law, but did not receive the required premium.

I worked for HSBC as a (please check all that apply):

- ☐ Personal Banking Officer
- ☐ Premier Relationship Manager
- ☒ Small Business Specialist
- ☒ Business Banking Specialist
- ☒ Personal Banker
- ☐ Commercial Banker
- ☐ Teller
- ☐ Other Non-Supervisory HSBC Bank USA, NA, Branch Employee  
(Specify Title: \_\_\_\_\_)

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signature

Date

Print Name

## **Fax or Mail To:**

**Paul Lukas  
Nichols Kaster & Anderson, PLLP  
4600 IDS Center, 80 S. 8<sup>th</sup> Street  
Minneapolis, MN 55402  
FAX (612) 215-6870**

REDACTED

**CONSENT AND DECLARATION**

**CERTIFICATE OF SERVICE**

Wong et al v. HSBC et al

**Case No. 07-2446 MMC**

I hereby certify that on April 29, 2008, I caused the following document(s):

**Notice of Consent Filing**

to be served via ECF to the following:

George J. Tichy, II  
Michelle Barrett  
Littler Mendelson  
650 California Street  
20th Floor  
San Francisco, CA 94108  
gtichy@littler.com  
barrett@littler.com

Dated: April 29, 2008

s/Bryan J. Schwartz

---

**NICHOLS KASTER & ANDERSON, LLP**

Bryan Schwartz, State Bar No. 209903

One Embarcadero Center

Suite 720

San Francisco, CA 94111

Telephone: (415) 277-7235

Facsimile: (415) 277-7238